



All policies carrying the Bryanston logo apply equally to any other brands or operations of Bryanston including Bryanston Knighton House

## **CODE OF CONDUCT FOR BRYANSTON SCHOOL STAFF**

### **1. Purpose, Scope and Principles**

This Code of Conduct is designed to give clear guidance on the standards of behaviour all school staff are expected to observe, and as such the School will notify staff of this code and the expectations therein and of any updating which takes place at annual review.

This code applies to all individuals working for the School at all levels (permanent, fixed term and temporary), and includes governors, volunteers, agents, contractors or any other person associated with us (collectively referred to as staff in this code).

### **2. Professional Conduct**

Staff are expected to promote fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

Staff must have proper and professional regard for the ethos, policies and practices of the School in which they teach and maintain high standards in their own attendance and punctuality.

In addition, specifically for teaching staff, the School has an expectation that teachers will put the well-being and education of their pupils first and will meet the DfE Teachers' Standards, the headline principles of which are that teachers must:

1. Set high expectations which inspire, motivate and challenge pupils;
2. Promote good progress and outcomes by pupils;
3. Demonstrate good subject and curriculum knowledge;
4. Plan and teach well-structured lessons;
5. Adapt teaching to respond to the strengths and needs of all pupils;
6. Make accurate and productive use of assessment;
7. Manage behaviour effectively to ensure a good and safe learning environment;
8. Fulfil wider professional responsibilities;
9. Uphold public trust in the profession and maintain high standards of ethics and behaviour within and outside the School;
10. Have proper and professional regard for the ethos, policies and practices of the School;
11. Have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

For further details visit <https://www.gov.uk/government/publications/teachers-standards>



### 3. Keeping Children Safe in Education

The School has a Safeguarding Policy and Child Protection Procedures and a Whistleblowing Policy; all staff must familiarise themselves with and abide by these policies.

All members of staff have a duty to report Child Protection concerns about a pupil to the Designated Safeguarding Lead of Bryanston or Bryanston Knighton House depending on which year the pupil attends.

In addition, all staff must attend training sessions, as required by the School. The School continues to carry out appropriate employment checks for all staff to ensure their eligibility and suitability to work at Bryanston.

#### Low level concerns

A 'low-level' concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – than an adult working with or on behalf of the School may have acted in a way that:

- is inconsistent with this Staff Code of Conduct, including inappropriate conduct outside of work;
- does not meet the allegations threshold or otherwise not considered serious enough to meet a referral to the LADO (but may merit consulting with and seeking advice).

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind closed doors;  
or
- using inappropriate sexualised, intimidating or offensive language.

The term 'low-level' concern does not mean that it is insignificant - it means that the adults behaviour towards a child does not meet the harm threshold as set out in the Schools Child Protection Policy and Safeguarding Procedures.

Identifying and reporting a low-level concern is regarded as just as important as a concern that meets the harm threshold. Staff are not expected to determine in each case whether their concern is a low-level concern or if it is not serious enough to consider a referral to the LADO, or whether it meets the allegation threshold. Once a member of staff has shared what they believe to be a low-level concern, that determination will be made by the Headmaster of Bryanston School. **Annex A provides a guide with examples of the type of allegation that may meet the harm threshold/allegation, what may constitute a low-level concern and appropriate conduct.**

**Annex B provides an extract of examples of cases of child sexual abuse by adults in organisational settings. Its purpose is to illustrate that it is rare for cases of**



**organisational child sexual abuse to occur without there having been preceding concerns observed by others. It also highlights other relevant issues about the circumstances of the abuse.**

The purpose of including information and procedure regarding low-level concerns is to create and embed a culture of openness, trust and transparency in which Bryanston values and expected behaviour which are set out in this Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

Bryanston wishes to have an environment in which Staff are invited, encouraged and feel confident to self-refer, where, for example, they have found themselves to in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Self-reporting can be positive for a number of reasons for example, it is self-protective and enables a potentially difficult issue to be addressed at the earliest opportunity. Self-reporting also demonstrates an awareness of an individual's own actions and maintains a culture of staff aspiring to the highest standards of conduct and behaviour.

#### Sharing a low-level concern

If member of staff has an allegation that may meet the harm threshold – they should follow the procedure in the Safeguarding and Child Protection Procedures Policy and Managing Allegations Against Staff Policy.

If a member of staff has what they believe to be a low-level concern no matter how small, about their own or another member of staff's behaviour must be shared with the Headmaster of Bryanston School as soon as reasonably possible, or in any event within 24 hours of becoming aware of it. If the Headmaster is not available, low-level concerns should be raised with the Secondmaster.

If the low-level concern is in relation to the Headmaster of Bryanston School or Head of Bryanston Knighton House, the low-level concern should be shared with the Chair of Governors.

The adult who is the subject of concern will be spoken to in order to ascertain their account. If the staff member who raised the concern does not wish to be named, the School will respect this as far as possible. Please be aware however that there may be circumstances where the staff member will need to be named for example where it is necessary to carry out a fair disciplinary process.

The Safeguarding and Child Protection Policy sets out the action required following a low-level concern being shared with the Headmaster.



#### **4. Honesty and Integrity**

Staff must maintain high standards of honesty and integrity in their work. In particular, staff must familiarise themselves with and abide by the School's Anti-bribery Fraud and Corruption Policy. In addition, staff must comply with school policies and procedures in relation to expenses and purchasing, the handling and claiming of money and the use of School property and facilities – see Code of Conduct Gifts by Bryanston and Staff Holiday work Extract.

#### **5. Confidentiality**

Staff must maintain the confidentiality of all confidential matters and information relating to past or current pupils (and/or their parents/carers), colleagues or the management of the School, the unauthorised disclosure of which might embarrass, harm or prejudice the individual or the School. In particular, staff must avoid:

- Posting or sharing such information online through any means such as social media sites;
- Allowing any unauthorised person from having access to such information which includes discussing such confidential matters with those persons who are not entitled to it;
- Responding to telephone enquiries from the press. Instead, these along with any other form of media enquiry, should be referred to the School's Marketing and Communications Department immediately.

Exemption for Safeguarding - staff have an obligation to share with the School's Designated Safeguarding Lead, any information which gives rise to concern about the safety or welfare of a pupil. Staff must never promise a pupil that they will not act on information that they are told by the pupil.

#### **6. Data Protection**

Staff must familiarise themselves with the School's Data Protection Policy for Staff. In particular, staff must only use personal data (any information which identifies a living individual) for purposes that are defined in the School's Record of Processing Activities which is held by the Data Protection Officer. Staff must store and process personal data securely and must not make any unauthorised disclosure or transfer of information outside the School. (Authorised disclosures or transfers are those defined within the School's Subject Access Request Policy, Privacy Notice or where the data subjects have given consent). Staff must securely dispose of personal data by shredding or permanent deletion of computer records at appropriate times as defined in the School's Records Management Policy. All staff must attend training sessions, as required by the school.

#### **7. Conduct Away from Work**

Staff must not engage in behaviour outside work which could seriously damage the reputation and standing of the School or the employee's own reputation or the reputation of other members of the school community.



In particular, offences that involve violence or the possession/use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable and will lead to the School responding appropriately by taking disciplinary action.

Staff must exercise caution when using Information Technology, in both a professional and personal capacity, and be aware of the risks to themselves and others which may also bring themselves and the school community into disrepute. (See the Guide to Bryanston/ Staff Handbook for further details.)

Staff may, with the agreement of the Headmaster and Chief Operating Officer, undertake work outside school, either paid or voluntary, provided that it does not conflict with the interests of the School nor be to a level which may contravene the working time regulations or affect an individual's work performance.

## **8. Relationship with Other Individuals**

Staff should treat others with respect and must not treat anyone less/more favourably than another because of his or her sex, sexual orientation, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, disability, age, ethnic background, religion or belief, political or immigration status.

### Staff and Pupils

All staff should understand that they are in a position of trust in relation to pupils and as such should ensure that their relationships with pupils clearly take place within the boundaries of a respectful and professional relationship and avoid any behaviour that might be misinterpreted by others. A relationship between an adult and pupil (of whatever age) is not a relationship between equals and there is potential for exploitation and harm to young people.

Staff should not have any form of web-based or telecommunication interaction with a pupil that could be interpreted as inappropriate, sexually suggestive or provocative i.e. via verbal comments, letters, texts, emails, personal social media accounts or through physical contact. Staff should not give their personal contact details to pupils for example, email address, home or mobile telephone numbers. Staff should not request or respond to any personal information from a pupil other than which may be necessary in their professional role. Staff should be alive to any possible interpretation that the behaviour could be regarded as 'grooming'.

Any sexual activity between a member of staff and a pupil (of whatever age - even if consensual) may be regarded as a criminal offence. Such activity will always be a matter for disciplinary action and will be regarded as a breach of professional misconduct.

Staff should recognise that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop a 'crush' or 'infatuation'. Staff should make every effort to ensure their own behaviour cannot be brought into question and does not appear to be encouraging such behaviour.



Staff should never offer to transport pupils outside their normal working hours, other than in an emergency or where not to do so would mean that the child may be at risk. In certain situations, it may be necessary for staff to transport pupils as part of their work. A judgement should be made about the likely behaviour or individual needs of the child and if close supervision is required at least one adult additional to the driver should act as an escort. Wherever possible and practicable, it is advisable that transport is undertaken other than in private vehicles.

Staff working in one-to-one situations with pupils, including visiting staff from external organisations can be more vulnerable to allegations or complaints. A risk assessment in relation to the specific nature and implications of one-to-one work should be undertaken. Wherever possible, ensure there is visual access and/or an open door in such situations. The use of 'engaged' or equivalent sign wherever possible. Staff must consider the needs and circumstances of the pupil involved and always report any situation where a pupil becomes distressed or angry.

There are occasions where it is appropriate and proper for staff to have physical contact with pupils however it is crucial that staff only do so in ways appropriate to their professional role and necessary in relation to a particular activity, for example, to demonstrate technique in the use of equipment and should only take place in a safe and open environment i.e., one easily observed by others. In situations where physical intervention is necessary procedures for restraint/use of reasonable force must be followed.

Staff in the Orchard Pre-Prep must abide by the Orchard Intimate Care Policy and Procedure.

Arranging to meet with pupils away from the School is not permitted unless with clear approval from a senior member of staff, the pupil and their parents/carers.

Staff may only take images of pupils in accordance with the School's Taking, Storing and Using Images of Pupil's Policy and the School's Bring your Own Device (BYOD) Policy. Staff in the Orchard Pre-Prep must not have mobile phones with them at any time, except when on outside break duty for emergencies. Prep school staff may not have mobile phones on display when pupils are present, except that during outdoor activities (e.g., games, riding) where phones may be carried for emergency use only. Mobile phones should be carried on school trips for emergency use. Staff are not permitted to use mobile phones for the making or receiving of personal calls during lesson time.

Staff must not invite any pupils into their living accommodation. It is not appropriate for staff (or appropriate to be expected) to use their private living space for any activity which includes seeing pupils for the discussion of reports, tutorials, pastoral care or counselling etc.

#### Staff and their colleagues

In order to maintain a positive, harmonious and supportive culture at Bryanston, staff must communicate with each other (either in person or via any other means, e.g. email) in a polite, respectful and professional manner at all times regardless of role and responsibility.



Colleagues should have the freedom to express opinions and ideas freely without feeling undermined, belittled or disrespected. Conflict should be addressed in a positive manner and the decisions of others respected.

Personal or professional differences are not an acceptable reason to behave unprofessionally.

Bullying/harassment will not be tolerated. All members of staff are expected to be vigilant in ensuring that instances of such are dealt with appropriately as soon as they are witnessed or reported.

Harassment may take the form of unwanted conduct which is related to a relevant Protected Characteristic which is perceived as affecting an employee's dignity at work. It may also take the form of unwanted conduct towards someone based on their appearance or other personal characteristics which is perceived as affecting their dignity at work. It is not only unwanted physical contact, assault or propositions; it includes suggestive remarks or gestures, pin-ups, graffiti, offensive comments, jokes and banter. Harassment may include bullying, intimidatory behaviour, persistent teasing or constant unfounded criticism of the performance of work tasks, unfair allocation of work and responsibilities, or exclusion from normal work place conversation. It may be directed towards one individual or a group. A single incident can amount to harassment if sufficiently grave.

## **9. Other Expectations of Staff – Staff should:**

- Exemplify and uphold the School's values
- Avoid putting themselves at risk of allegations of abusive or unprofessional behaviour;
- Avoid situations of actual or perceived conflict of interest;
- Ensure all activity for which they are responsible is undertaken with due regard to relevant legislation/regulations;
- Promote a safe working environment in compliance with the requirements of Health and Safety and be aware of all appropriate legislation/regulations;
- Treat with respect and not undermine pupils, their parents or carers, or colleagues;
- When representing the School (with parents/colleagues/suppliers/other third parties) act in a manner that promotes the aims and ethos of Bryanston;
- Optimise the use of resources for which they are responsible and over which they have influence.
- Comply with all the School's policies and procedures;
- Demonstrate behaviour that sets a good example to all the pupils within the School;
- Not enter private business arrangements with pupils or parents, without the prior approval of the Headmaster, secured in writing;
- Not use school property for private business purposes, without the prior agreement of the Headmaster/Chief Operating Officer, secured in writing;
- Not take any items of the School's equipment for personal use/gain that may have, or appear to have been discarded, without the prior agreement of the Headmaster and/or Chief Operating Officer secured in writing.



## **10. Disciplinary Action**

All staff must recognise that failure to meet these standards of behaviour and practice may result in disciplinary action, which might include dismissal.

Reviewed: September 2021  
Reviewer: Senior Leadership Team  
Next Review: September 2022  
Author: Second Master/Human Resources Director



## **Appendix A**

### **Spectrum of Behaviour**

#### **Allegation**

Behaviour which indicates that an adult who works with children has:

- ī behaved in a way that has harmed a child, or may have harmed a child; and/or
- ī possibly committed a criminal offence against or related to a child; and/or
- ī behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- ī behaved or may have behaved in a way that indicates they may not be suitable to work with children.

#### **Low-Level Concern**

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- ī is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
- ī does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

#### **Appropriate Conduct**

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.



## Appendix B

### Table of key features of 15 cases of child sexual abuse in organisational settings

This table contains examples of fifteen cases of child sexual abuse by adults in organisational settings which were subsequently the subject of a public enquiry or published external review.

Its purpose is to illustrate that it is rare for cases of organisational child sexual abuse to occur without there having been preceding concerns observed by others. It also highlights other relevant issues about the circumstances of the abuse.

#### Education Sector<sup>49</sup>

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##### Case and source of information

##### 1. Vanessa George

Not for profit nursery (UK) for children aged 2+ and babies under 1 year. Plymouth Safeguarding Children Board  
(2010) *Serious Case Review re Nursery Z*. Plymouth, Plymouth Safeguarding Children Board.

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##### The perpetrator

Female nursery worker.

Aged 39 when sentenced in 2009.

*Known* to have abused babies and children between late 2008 and June 2009.

Concerns about Mrs. George's behaviour were raised from late 2008 (she joined the nursery in 2006).

Took indecent images of, and sexually abused children at, the nursery where she worked.

Sent images of herself abusing children at the nursery to a male who she met over the internet. She did not meet him in person until their trial.

A popular member of staff who was described as having changed around the time of the commencement of the abuse.

Initially described by the community as happy and bubbly.

The SCR states "Although she was not senior in her position, other factors such as her age, personality and length of service could have created an illusion of position of power and encouraged a sense of trust." (Paragraph 5.2)

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##### Known victim(s)

Babies and children under school age – exact ages unknown.

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Police were unable to identify victims. Victims were too young to report the abuse.

Staff noted changes from December 2008 when Mrs. George started to talk about chasing men and sexual encounters.

Mrs. George was noted to not use general nappy changing areas but to use cubicle with full door. Mrs. George justified this on the basis that she could not bend to change nappies.

Mrs. George's physical bulk blocked line of sight of her activities.

Mrs. George's position of power within the staff group was such that although staff became increasingly concerned about her crude language, discussion of extra-marital relationships and showing indecent images of adults on her phone, they felt unable to challenge her.

It is possible that staff believed they had "allowed" the abuse to happen as they had been drawn into her discussions about adult sexual behaviours but had not known how to raise this with others.



A student on placement was described as being petrified of the nursery manager, which may have been indicative of the culture of the nursery.

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## Education Sector

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### **Organisational culture**

Staff described the nursery as dirty, depressing and demoralising.

There were poor recruitment practices. Roles and boundaries were not clear.

Roles of Trustees were not clear.

The nursery complaints procedure was not clear. Cliques within staff made it difficult to report or act. There was poor recording of incidents and follow up.

There were no whistleblowing procedures nor advice around e.g. nappy changing etc.

The ratio of staff to children was frequently breached, allowing Mrs. George more opportunities to be alone with a child.

A review of records and staff interviews made it clear that the nursery was not able consistently to provide a safe, positive environment for the children in its care.

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Staff had little or no knowledge of sexual abuse or offending.

### **Family and community**

Parents thought the manager was the owner of the nursery, which was not

the case.

Governance arrangements were poor.

Parents did not know how to make a complaint.

Parents and nursery workers socialised together – blurring boundaries.

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The nursery manager was also a Governor of the school that the nursery was associated with, and a foster carer, meaning the community expected that she would understand safeguarding, which in turn made it more difficult to challenge the ethos of the school.

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## Education Sector

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### **Case and source of information**

#### **2. Robert Stringer**

State Primary (UK).

Raynes, B (2011) *Executive Summary of Serious Case Review Written About Teacher Mr X*, Hillingdon Local Safeguarding Children Board.

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### **The perpetrator**

Male; joined the school as a newly qualified teacher.

Committed suicide when due for trial in 2010, aged 56. Known to have abused girls between 2003 and 2009.

Concerns about Mr. Stringer's behaviour were raised in 1998 – the year he joined the school.

Charged with 25 offences against four girls between 2000-2007.

Set up and led a prestigious drama club with which Mr. Stringer used to test out the likely resistance of children he targeted for abuse.

Difficult to manage, he flouted school rules and his lessons were known to lack structure.

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**Known victim(s)** Girls under 13 years old, the youngest aged 9.

Known to have favourites.  
Pupils were aware that Mr. Stringer had access to a large knife used in drama productions.

Pupils sought status through selection for roles in the drama club.  
Pupils were told Mr. Stringer would go to prison if they disclosed and no-one would then be able to look after his disabled wife.

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**Colleagues** Head and colleagues found Mr. Stringer “difficult.”

Mr. Stringer instilled fear in staff through his behaviour e.g. shouting at them.  
Staff expressed concerns about Mr. Stringer’s relationship with pupils in the drama club.

Anonymous referral was made to the headteacher.  
Reported concerns included suspicious photos on Mr. Stringer’s computer and him showing 15 rated DVD with explicit sex scenes to year 5 (9-year-old) pupils. This latter concern was reported by the parent of another child.

Two teachers who attended safer recruitment training informed the headteacher that Mr. Stringer “ticks all the boxes of the [training] exercise *Profile of an abuser.*”

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**Organisational culture** Mr Stringer’s offending spanned the tenure of two headteachers. Weak leadership of the first headteacher, and personal distractions of the second headteacher, fostered a culture where safeguarding was not taken seriously.

Lack of record keeping meant patterns of behaviour were not identified.

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**Family and community** Parents were desperate for their children to get into the drama club which Mr. Stringer used to foster strong relationships with parents.  
Parents petitioned for Mr. Stringer to return to the school when suspended.  
Mr. Stringer had strong backing from the governing body making it difficult for second headteacher to challenge him.

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## Education Sector

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### **Case and source of information** 6. Jonathon Thomson-Glover

Independent boys’ day and boarding school (UK).

Jones, P. (2016) *Investigation into Safeguarding Issues at Clifton College Arising from The Prosecution Of X*, Bristol: Clifton College.

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**The perpetrator** Male Housemaster, teacher and former pupil of the school.

Aged 53 when convicted in 2016.

*Known* to have abused secondary aged boys over a period of 16 years. Also took covert indecent photographs and video of male and female pupils.

Concerns about Mr. Thomson-Glover’s behaviour were raised from 1999 onwards.

Convicted of taking indecent images of pupils between 1998-2004. 330 tapes were recovered by Police.

Secretly installed cameras.



Groomed pupils through providing friendship, beer, pizza, socialising and encouraging them to break school rules. Sexualised relationships through “banter” and discussing his own sexual relationships.

Befriended adult carers and headteachers.

Described by boys as behaving like a friend rather than a teacher.

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**Known victim(s)** Boys – described as “good looking, naughty, sporty” were favourites.

“Chosen” to go and stay at a holiday cottage owned by Mr. Thomson-Glover, where he also abused two boys.

Victims were also chosen to socialise with Mr. Thomson-Glover in his (school) study, where alcohol was consumed.

In 2003 pupils complained about Mr. Thomson-Glover sleeping in the school boarding house, locking the kitchen and drinking alcohol.

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Colleagues noticed blurred boundaries between pupils and Mr. Thomson- Glover.

An Education Psychologist was concerned about favourites and Mr. Thomson- Glover fitting the profile of an abuser.

Several allegations were made about Mr. Thomson-Glover being tied up in his study by pupils in a state of undress.

A cleaner reported Mr. Thomson-Glover wrapping a boy in cellophane as a prank.

Concerns were expressed by non-teaching staff who could see Mr. Thomson- Glover’s behaviour was different from other staff. Complaints were diluted, lost or disbelieved as they went up the management chain.

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**Organisational culture** A liberal ethos in the school had developed from its early days and this deterred people from reporting concerns when rules were broken. Favouritism was part of the school culture.

There was a culture of “informally socialising.” There was a culture of “pranks” in the school.

There was a lack of curiosity or consideration that “it could happen here.”

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## Education Sector

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**Family and community** whom would make There were permeable boundaries with families, some of private visits to Mr. Thomson-Glover’s holiday cottage. Some parents complained that trips were only for favourites.

There was a lack of confidence in the complaints system by families in the late 2000’s – they did not want to “rock the boat” in case it was taken out on a pupil. The headteacher and Mr. Thomson-Glover seemed to be friends.

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